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ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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| In the Matter of | ) | |
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| Amendment of the Commission's | ) | |
| Rules to Establish Rules and | ) | CC Docket No. 92-166 |
| Policies Pertaining to a Mobile | ) | |
| Satellite Service in the 1610-1626.5- | ) | |
| 2500 MHz Frequency Bands | ) | |

To the Commission:

National Public Radio, Inc. ("NPR") submits these comments in response to the Commission's Notice of Proposed Rulemaking, CC Docket NO. 92-166, released February 18, 1994 ("NPRM"). This NPRM regards rules and policies governing proposals to construct satellite systems that would provide a variety of voice and data mobile satellite services in the 1610-1626.5/2483.5-2500 MHz frequency bands ("MSS Above 1 GHz Service").

NPR is a non-profit, noncommercial, membership organization that provides programming and interconnection services to 492 full-service public radio stations and represents them in developing and maintaining a viable and diverse public radio service for the American public. The rules and policies stemming from the NPRM have the potential to affect significantly both NPR and these stations.

We applaud the Commission's recognition in the NPRM of the important interests that may be served by providing public access to the MSS Above 1 GHz Service. This recognition parallels longstanding Congressional, Commission, and NPR policies that

support the extension of both existing and new telecommunications services to unserved, under-served, and a more diverse audience.

There is significant potential for a variety of both broadcast and non-broadcast public service uses for MSS Above 1 GHz Service. NPR believes that MSS Above 1 GHz Service could have a meaningful impact on remote newsgathering activities. In many regions of the world, there are areas without access to telephones or other communications gateways beyond the "main highway." Newsworthy events and cultural offerings do not confine themselves geographically to cities or towns with pre-existing technical infrastructure. Utilization of MSS Above 1 GHz Service could result in fewer regions being beyond the reach of newsgathering organizations. Access to this information enhances our ability and the ability of other public telecommunications service providers to better educate and inform the public about important national and international issues and events.

Voice communications, data traffic, facsimile, and text could be made available to regions not likely to be adequately served within the foreseeable future via MSS Above 1 GHz Service. The availability of these communication services would facilitate the reporting of information regarding important issues in previously inaccessible areas. In addition, such gathered information could readily be communicated to emergency response agencies thereby improving government and other responses to emergency needs. It would also allow news organizations to monitor the safety and well-being of its reporters in at-risk situations. In short, better

and more readily accessible public service information would be available to both the government and to public telecommunications providers more efficiently and effectively via MSS Above 1 GHz Service.

NPR's ability to increase the reach of our programming to schools, hospitals and libraries also could be facilitated by MSS Above 1 GHz Service. Geographically isolated areas previously inaccessible to existing technologies would now be reached. Remote, on-site feeds could now be efficiently be linked into existing public radio systems.

In order to assure public access to the MSS Above 1 GHz Service, we encourage the Commission to require successful applicants to provide capacity to public service organizations, including public telecommunications service providers, at rates not to exceed the applicant's direct costs for providing such service. These preferential rates advance the clearly articulated and compelling government interest of increasing public access to educational, informational, cultural, and public interest programming through all distribution technologies.

The Commission is at an important crossroads in the implementation of the mobile satellite service as it attempts to set standards governing this technology. NPR believes that any digital standards now being developed for MSS must complement standards of the existing digital environment and enable users seamlessly to utilize a variety of telecommunications services. For example, MSS applicants anticipate feeding their services into

the public switched digital network ("PSDN"). The PSDN already has integrated services digital network ("ISDN") capabilities that allow NPR to provide broadcast quality signals to and from the public radio community via the PSDN. It seems prudent that new MSS standards include technical provisions that would enable MSS service users to gain access to MSS-supplied audio through the PSDN at a level of quality no less than that currently offered by the ISDN capabilities.

Lastly, we share the Commission's concerns regarding the very real potential for interference posed by spectrum sharing between low earth orbit users (LEO) and geosynchronous (GEO) traffic. Based on the information currently available to us, however, it appears that the specific frequencies identified in the NPRM for LEO uplinking and downlink feeder links present no significant conflict with NPR's current GEO services. This is attributable to the fact that NPR is utilizing different frequencies from those identified by LEO applicants. We urge the Commission to remain vigilant, however, in guarding against the serious interference threat to C-Band satellite users (especially SCPC users) posed by specific frequency sharing between LEO and GEO operations.

In conclusion, NPR's efforts in newsgathering, programming, community outreach, and expansion each have the potential to be enhanced by access to MSS Above 1 GHz Service. We believe that by assuring public access to the MSS Above 1 GHz Service at preferential rates and pursuant to standards complementary to existing technologies, the Commission can advance tangible and

significant public service goals for not only NPR and public radio in general, but for the national and global public, as well.

Respectfully submitted,

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